

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

**PLAINTIFFS' MOTION TO SEAL CERTAIN ACCOMPANYING EXHIBITS TO
PLAINTIFFS' STEERING COMMITTEE'S OBJECTION TO PROPOSED CASE
MANAGEMENT ORDER OF THE SPECIAL MASTER RELATING TO DISCOVERY
AND DEPOSITIONS**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee, hereby move to file Exhibits 9 and 10 to Plaintiffs' Steering Committee's Objection to Proposed Case Management Order of the Special Master Relating to Discovery and Depositions under seal, and to redact those portions of the Objection referring to the sealed Exhibits.

The documents at issue have previously been produced by Defendant Johnson & Johnson in this litigation and designated as "Protected Document – Subject to Protective Order." Therefore, Plaintiffs move the Court for leave to submit the exhibits to the foregoing motion under seal in order to protect the documents.

A proposed form of Order has been simultaneously submitted.

Respectfully Submitted,

Dated: February 20, 2018

/s/ Michelle A. Parfitt

Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
4900 Seminary Rd., Suite 650
Alexandria, VA 22311
Tel: 703-931-5500
Fax: 703-820-1656
mparfitt@ashcraftlaw.com

/s/ P. Leigh O'Dell

P. Leigh O'Dell
BEASLEY, ALLEN, CROW, METHVIN
PORTIS & MILES, P.C.
218 Commerce St.
Montgomery, AL 36104
Tel: 334-269-2343
Fax: 334-954-7555
leigh.odell@beasleyallen.com
Plaintiffs' Co-Lead Counsel

/s/ Christopher M. Placitella

Christopher M. Placitella
COHEN, PLACITELLA & ROTH, P.C.
127 Maple Ave.
Red Bank, NJ 07701
Tel: 732-747-9003
Fax: 732-747-9004
clpacitella@cprlaw.com
Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

s/ P. Leigh O'Dell

P. Leigh O'Dell
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, PC
218 Commerce Street
Montgomery, AL 36104
Telephone: 334-269-2343
Email: leigh.odell@beasleyallen.com

Plaintiffs' Co-Lead Counsel